Response to Plaintiff's Motion to Compel

When I tried explaining I would absolutely need a continuance due to a severe medical emergency, opposing counsel demanded I provide proof of such emergency to him.

Counsel has absolutely no right to my medical information, and therefore, I rejected this. When I mentioned to the court that Opposing Counsel stated that he required my medical information, which he clearly reiterates in his motion, he then sent me an email saying he had done no such thing.

In fact, he did. He said he demanded the medical emergency information or he'd be forced to compel. That is demanding my medical information, and therefore, by definition, makes the second statement a lie. Any reasonable person who reads those two emails side by side see both the lie and gaslighting attempt in the second email.

Ad Hominem is name calling instead of debating the issue. That was not, in any way, what I was doing. I simply called him out and am holding him accountable for his abhorrent behavior in having the gall to tell me he never asked for my medical information, when the evidence CLEARLY shows that he did. (And then showed this, yet again, in his Motion.)

As a human being, I am allowed to call out poor behavior in a person I am forced to deal with. I find him requesting my medical information to be highly unethical. I also find him lying about doing so to me unethical. Then, denying the lying just adds gaslighting.

When I said, "my father", clearly Opposing Counsel has never heard of remarriage and step-families. He should stop acting like he knows everything before filing a motion with the court. This arrogance and assumptive behavior is also unbecoming and unacceptable.

I continue to assert that keeping the blog up, although it is not easily found, is imperative for anyone who may be forced to work with Doctor Amor or Quinn Harlin in the future. It is not out of bounds to tell someone to be careful because of other people's personal experiences with a person.

It is also not defamation if the only harm is the sole personal embarrassment of the plaintiff. His ego is not defamation. Defamation is a deliberate lie that causes actual harm to the plaintiff in one respect or another. For it to have reputation damage, there must be evidence there are people who thought of him highly that didn't know about this, and now they see him differently and act differently. There has been no evidence or argument of this occurring. The only evidence is my own, which shows this was a widely known circumstance.

I am still awaiting any information regarding how he intends to prove I have lied maliciously or recklessly, making the entire tale up on my own. As I have already shown evidence absolutely nothing in my blog came from me or are my own experiences and words. Perhaps counsel should be suing the parties who have actually brought these claims against him. Namely, Brianna Kube and Kayla Miller. I am a third party. Suing a third party is completely illogical. It will also not stop the "rumors" about Doctor Amor as I am not the one who has spread it or

said it. I am only repeating the tale of others who have been spreading it internally for years. I am not the person who should be sued here, as clearly, by my own evidence, I am not the one who levied these allegations against Doctor Amor. I simply published them. I don't remember reporters of Me, Too claims being sued for defamation. It is those who made the claim who are. Not the ones who published others' claims.

Emergency

I am dealing with a medical emergency at the moment that I absolutely not do not wish to disclose, nor do I have to by law. As of this time, I will know by Wednesday, March 16th or 17th if I will be hospitalized for a sum of 3-4 weeks according to the doctor. I am very ill at the moment and struggling to complete the most basic tasks. I have not left my bed in a week. I will not be harassed by some attorney while I'm sick.

My doctors have warned me against additional stress and this attorney is making sure I have as much as possible to make the condition worse. I request no further contact with him until I am able to be cleared medically. He is going to delay my recovery with his arrogance and insistence I behave as though I'm not ill and under a physician's care.

I have been chronically ill for well over a decade. I was not expecting this to happen right now, but it has, and I need to deal with it. I cannot reasonably deal with this at this time.

If the court sees fit to grant his motion to compel, I will not be able to do the deposition due to medical impossibility. And so, you can order it, but you'll just have to come physically drag me out of my bed or a hospital bed to charge me with contempt of court, as I am physically unable at this time. I guarantee my doctors will be interfering, if it comes to that.

You must understand that this is beyond my control. I cannot reasonably comply with Opposing Counsel's demands at this time. I simply cannot physically do it.

Request

I request a continuance of the entire case for 4 weeks. In 4 weeks' time, I will comply with the Opposing Counsel's request to be deposed, and we can carry on the hearing the following week. I don't know what else to say to the court but to say I simply cannot comply at this time, regardless of my wish to do so.

I also request that the judge inform the Opposing Counsel to stop harassing me, demanding things, and refusing to let up. He did indeed ask for my medical information, he did indeed lie about doing so, and then did so again in his motion. I find this behavior not only abhorrent, but my doctors want me to block the email addresses due to his unnecessary stress upon me at this

time. They are monitoring my stress levels on a Garmin 4 as we speak, and I get phone calls regularly if it goes too high. Obviously, Opposing Counsel's behavior is something my doctor's insist is making it worse.

I will be able to comply in the span of one month. Until then, you'll have to physically drag me out of bed to get it. I'm sorry, but it's the facts at the current time.

I will not be replying to any further communication about this issue to the Opposing Counsel and only to the court. I request the Opposing Counsel immediately abstain from sending me constant harassing emails. Thank you.

Courtney Conover

Exhibit A – Counsel's demand of my medical information. "What is the emergency?" is a request for information. "We require some proof" is a demand, and a requirement, for me to give him my personal medical information which he is not entitled to.

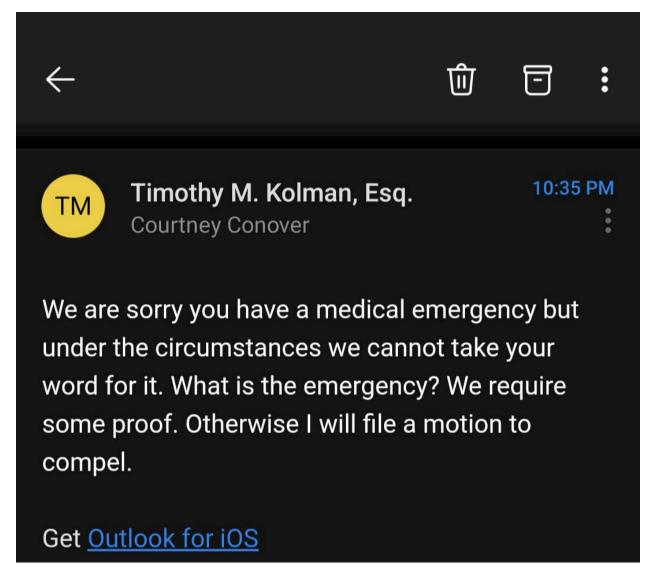
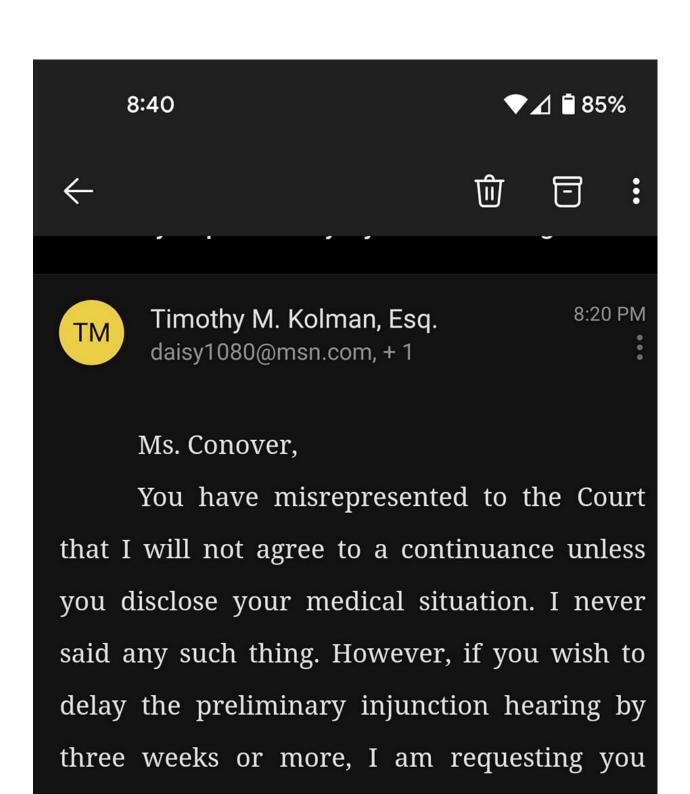


Exhibit B - Counsel claiming 24 hours later that he, in fact, did not ask or demand my medical information, although it was clearly "required" in the previous email. This is why the email is a lie. It is also why denying he did such things when the evidence proves he did exactly that, is a technique known as gaslighting. All reasonable parties can see that he did, in fact, "require" that I give him medical information in order to agree to my continuance.



It is unfair that my client should wait for

agree

to

a

preliminary injunction for the interim.

Court Order granting

the